

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

IN RE: GEA SEASIDE INVESTMENT INC.

CASE NO.: 3:18-BK-0800-JAF  
Chapter 11

Debtor(s).

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**OPPOSITION RESPONSE TO NOTICE OF DEFAULT**  
**(109 RAYMOND AVENUE, PORT ORANGE, FL 32127)**

Debtor files this Response to the Notice of Default (the “Notice of Default”; Doc. 1440) filed by PHH Mortgage successor in interest to Ocwen Loan Servicing (“Secured Creditor”). In support of this Response, Debtor states as follows:

1. Debtor and Creditor entered into a Stipulation Regarding Class 10 Plan Treatment (the “Stipulation”; Doc. 941).
2. The Stipulation required Creditor to provide Debtor with ten (10) business days notice and opportunity to cure. Creditor errantly furnished only ten (10) non-business days notice and opportunity to cure in the Notice of Default.
3. The Stipulation also requires Creditor furnish notice via certified mail to Debtor at:  
  
GEA Seaside Investment, Inc.  
c/o Jack Aberman  
428 N. Peninsula Ave  
Daytona Beach, FL 32118
4. The Certificate of Service for the Notice of Default does not specify that Creditor complied with this requirement.
5. Accordingly, based on the foregoing, the Notice of Default is procedurally deficient.
6. Creditor asserts a default of \$7,108.64.
7. Upon a review of Debtor’s records, Debtor asserts the delinquency is no more than (and possibly even less than) \$4,062.08.

8. The Stipulation provides for payments to be made to Ocwen Loan Servicing. PHH Mortgage filed the Notice of Default. Secured Creditor has not sought to amend the Stipulation to update the required payment address.
9. Debtor is mailing via certified mail for the disputed delinquent funds of \$4,062.08 payable to PHH Mortgage and mailed to April Harriott, Attorney for PHH Mortgage, 6409 Congress Ave., Suite 100, Boca Raton, FL 33487 with tracking #70180360000032829812.
10. Copies of the check and certified mail receipt are attached as Exhibit 1.
11. Debtor is in the process of reviewing its payment records and reserves the right to further dispute the amount of the default.

Respectfully submitted this 2nd day of February, 2022.

By: /s/ Taylor J. King  
TAYLOR J. KING  
Attorney for Debtor  
5452 Arlington Expressway  
Jacksonville, Florida 32211  
(904) 725-0822\FAX 725-0855  
Florida Bar No. 72049  
[tjking@planlaw.com](mailto:tjking@planlaw.com)

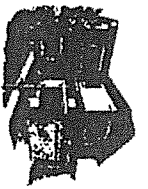
#### **CERTIFICATE OF SERVICE**

I DO HEREBY CERTIFY that a copy of the foregoing was furnished by either CM/ECF electronic filing or U.S. Mail, postage prepaid to Office of the U.S. Trustee, 400 W. Washington St., Suite 1100, Orlando, FL 32801; and to April Harriott, Attorney for the Secured Creditor, this 2nd day of February, 2022.

Law Offices of Mickler & Mickler

By: /s/ Taylor J. King  
TAYLOR J. KING  
Attorney of Debtor  
5452 Arlington Expressway  
Jacksonville, Florida 32211  
(904) 725-0822/FAX: 725-0822  
Florida Bar No.: 072049

**EXHIBIT 1 – COPIES OF CHECK AND CERTIFIED MAIL RECEIPT**



**Geo Seaside Investment Inc.**  
**DBA DAYTONA PROPERTY MANAGEMENT**  
 428 N Peninsula Dr  
 Daytona Beach, FL 32118

**VYSTAR**  
 PO BOX 45065  
 JACKSONVILLE, FLORIDA 32232  
 904-7927/2630

PAY TO THE ORDER OF **PHH Mortgage**

\$ 1571.54

One thousand five hundred seventy one and 54/100 DOLLARS

336 N Peninsula Dr, Daytona Beach, FL 32118

MEMO

# 7190785126

008225 12630792761

7901148289

*[Signature]*

008225



**Geo Seaside Investment Inc.**  
**DBA DAYTONA PROPERTY MANAGEMENT**  
 428 N Peninsula Dr  
 Daytona Beach, FL 32118

**VYSTAR**  
 PO BOX 45065  
 JACKSONVILLE, FLORIDA 32232  
 904-7927/2630

PAY TO THE ORDER OF

**PHH Mortgage**

\$ 4063.08

Four thousand sixty three and 8/100 DOLLARS

MEMO

109 Wynwood Ave, Fort Myers, FL # 801433930

008225 12630792761

7901148289

*[Signature]*

THIS DOCUMENT CONTAINS A COLOR PICTURE OF THE SIGNATURE OF THE PERSON WHO SIGNED THIS DOCUMENT. IF THE SIGNATURE IS NOT THE SAME AS THE SIGNATURE OF THE PERSON WHO SIGNED THIS DOCUMENT, THE SIGNATURE IS NOT VALID.



DAYTONA BEACH PENINSULA  
19 N ATLANTIC AVE  
DAYTONA BEACH, FL 32118-4201  
(800)275-8777

02/01/2022 02:36 PM

Product	Qty	Unit Price	Price
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First-Class Mail® Letter	1		\$0.58
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Cincinnati, OH 45227  
Weight: 0 lb 0.20 oz  
Estimated Delivery Date  
Sat 02/05/2022

Certified Mail®			\$3.75
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Tracking #:  
70180360000032829812

Total			\$4.33
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First-Class Mail® Letter	1		\$0.58
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Boca Raton, FL 33487  
Weight: 0 lb 0.40 oz  
Estimated Delivery Date  
Sat 02/05/2022

Certified Mail®			\$3.75
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Tracking #:  
70180360000032828662

Return Receipt			\$3.05
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Tracking #:  
9590 9402 6021 0069 3227 95

Total			\$7.38
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Grand Total:			\$11.71
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Personal/Bus Check			\$11.71
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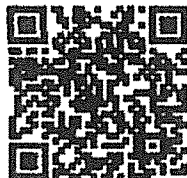
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